

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:  Angel Almonte  Debtor(s)	Chapter 13  Docket No. 18-13059
--	---------------------------------------

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rules 2002, 9007 and 9010, as well as the Bankruptcy Code §§ 102(1), 342, and 1109(b), VALERI NAGRUDNY and MICH G. VLADISLAV (hereinafter, collectively, as the "Creditor"), a creditor and party-in-interest, by and through its undersigned attorneys, hereby appears in the above-referenced case of the above-referenced Debtor(s).

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code § 1109(b), Creditor requests that all pleadings, documents, and notices (including, without limitation, not only those pleadings, documents, and notices referred to in Bankruptcy Rule 2002, but also any orders, applications, motions, petitions, requests, complaints, answers, replies, schedules of assets or liabilities, statements of financial affairs, operating reports, plans of reorganization, disclosure statements, or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, e-mail, or otherwise) filed, given or to be given in the Debtor(s)' case be given and served upon:

Demetri A. Braynin, Esquire  
KALIKHMAN & RAYZ, LLC  
1051 County Line Road, Suite "A"  
Huntingdon Valley, PA 19006  
Phone: (215) 364-5030  
Fax: (215) 364-5029  
E-mail: dbraynin@kalraylaw.com

PLEASE TAKE FURTHER NOTICE that, neither this notice, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with the Debtor(s)' cases is intended to be, or shall be construed as, a waiver of Creditor's (i) right to have final orders in non-core matters entered only after review *de novo* by a District Court judge; (ii) right to trial by jury in any proceedings so triable in these cases or any case, controversy, or proceeding related thereto; (iii) right to have the

reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments, all of which rights, actions, setoffs, defenses, and recoupments are expressly reserved.

Respectfully submitted  
**KALIKHMAN & RAYZ, LLC**

/s/ Demetri A. Braynin

Demetri A. Braynin, Esquire  
Attorney(s) for Creditor  
1051 County Line Road. Suite "A"  
Huntingdon Valley, PA 19006  
Phone: (215) 364-5030  
Fax: (215) 364-5029  
E-mail: dbraynin@kalraylaw.com

Date: May 29, 2018